

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

<b>ROBERT YOUNG, <i>et al.</i>,</b>	:	
	:	<b>Case No. 1:16-cv-1006</b>
Plaintiffs,	:	
	:	<b>JUDGE TIMOTHY S. BLACK</b>
v.	:	
	:	
<b>RANDALL WINKLER, Mayor</b>	:	
<b>Municipality of Carlisle, Ohio, <i>et al.</i>,</b>	:	
	:	
Defendants.	:	

**PLAINTIFFS ROBERT AND ELIZABETH YOUNG’S MEMORANDUM IN RESPONSE  
TO DEFENDANTS’ MOTIONS FOR LEAVE TO FILE MOTION TO ENFORCE  
SETTLEMENT AGREEMENT UNDER SEAL AND TO DISCLOSE CONFIDENTIAL  
MEDIATION COMMUNICATIONS**

Plaintiffs Robert and Elizabeth Young (Plaintiffs) do not oppose Defendants’ motions to file under seal a motion to enforce settlement agreement and to disclose confidential mediation communications (Doc #21).

However, contrary to Defendants’ assertions regarding Plaintiffs’ compliance, it is Defendants who have repeatedly engaged in conduct prohibited under federal fair housing laws and violated both agreed upon compromises as well as the spirit of the settlement agreement entered into by the Parties on August 17, 2017 (Doc #19). In doing so Defendants have callously and wantonly endangered the health and well-being of Plaintiff Robert Young.

Evidence and case law supporting Plaintiffs’ position will be filed upon Plaintiffs receipt of Defendants’ full motion and detailed allegations. Plaintiffs respectfully request this Court schedule a status conference with Counsel for the Parties prior to issuing a ruling on Defendants’ motions to file under seal and to disclose confidential mediation communications.

Respectfully submitted,

/s/C. Raphael Davis-Williams  
C. Raphael Davis-Williams (0087003)  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Plaintiffs' Memorandum in Response to Defendants' Motions to File Motion for Enforcement of Settlement and to Disclose Confidential Mediation Communications was filed electronically with the Court's Case Management/Electronic Case Files (CM/ECF) docketing system on this 12th day of June, 2018. Notice of this filing will be sent by operation of the CM/ECF system. Parties may access this filing through the CM/ECF system.

/s/C. Raphael Davis-Williams  
C. Raphael Davis-Williams (0087003)